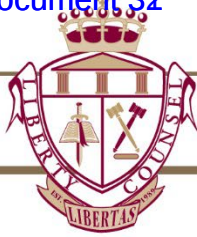


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REPLY TO FLORIDA

November 21, 2024

Via ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Pagan v. Research Foundation of CUNY, et al.*, Case No. 1:24-cv-06500-RA

Dear Judge Abrams:

I am the attorney of record for the Plaintiff in the above-referenced action. I commenced this action on Plaintiff's behalf while operating my law firm, Kristina S. Heuser, P.C. Since that time (within the last several weeks), I have joined Liberty Counsel as full-time Senior Litigation Counsel. Therefore, I have had to wind down my practice and am no longer able to handle this (or any other) matter apart from Liberty Counsel.

Liberty Counsel has conferred with Ms. Pagan about assuming representation of her in this matter, but formal representation has not yet been established. For this reason, I write to respectfully request an extension of time of forty-five (45) days for Ms. Pagan to advise the Court if she intends to amend her pleading or otherwise respond to Defendants' respective motions to dismiss. I believe this amount of time is necessary and appropriate in light of the intervening holidays and so that Ms. Pagan can retain new counsel in this action, whether that be Liberty Counsel or another law firm. I have conferred with opposing counsel and they consent to this request.

On behalf of Plaintiff, I thank the Court for its anticipated courtesy.

Application granted.

SO ORDERED.

Hon. Ronnie Abrams
November 26, 2024

Very Truly Yours,

/s/ Kristina S. Heuser

Kristina S. Heuser, Esq.

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